28

STIPULATION TO EXTEND TIME

It is hereby stipulated between Plaintiffs and the City of Los Angeles, Lt. Andrew Mathis, Sgt. Hamer and Sgt. Richter (collectively "the City") as follows:

1. The City has filed a Motion for Clarification of the Court's order of April 13, 2016 issuing a preliminary injunction. The motion was originally set for July 25, 2016.

2. Over the past several months, the City and Plaintiffs engaged in several mediation sessions on the City's concerns underlying the motion on multiple dates beginning on May 9, 2016, before the Honorable Carla Woehrle. Progress was made in those sessions, and the parties agreed to continue the process.

3. Each of the parties has engaged in additional separate discussions with former Magistrate Judge Woehrle and have provided written responses to the issues under discussion. The discussions with former Magistrate Judge Woehrle are continuing. The parties are presently awaiting a written document from the judge, setting forth the parties' respective positions on the remaining issues, after which the parties will see if some or all of those matters can be resolved.

4. Under the present schedule, Plaintiffs' opposition to the motion is currently due January 23, 2017.

5. To avoid the necessity of Plaintiffs opposing the motion when the parties are still engaged in mediation, the parties request that the motion hearing date be continued

be continued.

6. In light of the schedule of Judge Woerhle, the parties believe another extension of the time for Plaintiffs' to file their opposition would be appropriate and that the current hearing date should be continued from February 13, 2017 to March 20, 2017 to allow the mediation discussions to continue.

| 1 | 7. The Plaintiffs and the City hereby stipulate, subject to Court approval, | |
|----|--|--|
| 2 | to continue the hearing date of the motion for clarification to March 20, 2017, in | |
| 3 | order to give the parties an opportunity to reach consensus on the issues underlying | |
| 4 | the motion. | |
| 5 | | |
| 6 | It is so stipulated. | |
| 7 | | |
| 8 | Dated: January 23, 2017 | CITY OF LOS ANGELES |
| 9 | | |
| 10 | | By: /s/ Eric Brown |
| 11 | | Eric Brown, Deputy City Attorney Attorneys for Defendants |
| 12 | | Attorneys for Defendants |
| 13 | Dated:January 23, 2017 | LAW OFFICE OF CAROL A. SOBEL |
| 14 | Dated.January 23, 2017 | LAW OFFICE OF CAROL A. SOBEL |
| 15 | | By: /s/ Carol A. Sobel |
| 16 | | Carol A. Sobel Attorneys for Plaintiffs |
| 17 | | · |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | • | 3 |